

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

<p>1. Name and address of registrant Maupin Taylor Ellis & Adams, P.A. (Domesticated in Washington, D.C. as Maupin Taylor Ellis & Adams, P.C.) 1130 Connecticut Ave., N.W., #750, Washington, DC 20036-3904</p> <p>3. Name of foreign principal Glaxo Australia Pty. Ltd.</p>	<p>2. Registration No. 4242</p> <p>4. Principal address of foreign principal 1061 Mountain Hwy. Boronia Post Office Box 168 Boronia Victoria 3155</p>
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5. Indicate whether your foreign principal is one of the following type: Australia

☐ Foreign government

☐ Foreign political party

☒ Foreign or ☐ domestic organization: If either, check one of the following:

<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee
<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group
<input type="checkbox"/> Association	<input type="checkbox"/> Other (specify) _____

☐ Individual—State his nationality _____

6. If the foreign principal is a foreign government, state: N/A

a) Branch or agency represented by the registrant.

b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state: N/A

a) Principal address

b) Name and title of official with whom the registrant deals.

c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal
Manufacturer of pharmaceuticals

b) Is this foreign principal

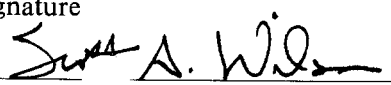
- Owned by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Directed by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☒
- Controlled by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☒
- Financed by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Subsidized in whole by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☒
- Subsidized in part by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☒

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

Glaxo Australia Pty. Ltd. is a wholly-owned subsidiary of Glaxo Holdings PLC of Great Britain, the stock of which is publicly traded.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N/A

Date of Exhibit A April 18, 1989	Name and Title Scott A. Wilson, Assistant Secretary, Director	Signature 
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INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in triplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda or other document or information filed with the Attorney General under this act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

Name of Registrant	Name of Foreign Principal
Maupin Taylor Ellis & Adams, P.A. (Domesticated in Washington, D.C. as Maupin Taylor Ellis & Adams, P.C.)	Glaxo Australia Pty. Ltd.

Check Appropriate Boxes:

1. ☒ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach three copies of the contract to this exhibit.
2. ☐ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach three copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
3. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

As set forth in the attached letter dated October 13, 1987 and related correspondence (See Attachments D, E, and F), the registrant will render advice and represent the principal on matters relating to the repeal or modification of the so-called "80/20 Rule." The fee for such representation is to be determined periodically, as set forth in the attached letter, based on usual hourly charges and other criteria for legal fees, plus out-of-pocket expenses. The duration of the agreement is indefinite.

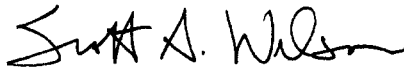
5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

The registrant will render advice and represent the principal on matters relating to the repeal or modification of the so-called "80/20 Rule." From October 1987 through February 1989 the registrant contacted various government officials for the purpose of providing education and obtaining their views on the 80/20 Rule.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?¹
Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The registrant may engage in political activities on behalf of the foreign principal. The registrant's activities may on occasion include communications on behalf of the foreign principal with Executive Branch officials, officials of government agencies, and with members of the U.S. Senate and House of Representatives and their staffs relating to repeal or modification of the so-called "80/20 Rule." See Attachment G for a description of such activities from October 1987 through February 1989.

Date of Exhibit B	Name and Title	Signature
April 18, 1989	Scott A. Wilson Assistant Secretary Director	

¹Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

Response to Question 4

Describe fully the nature and method of performance of the above indicated agreement or understanding.

MAUPIN TAYLOR ELLIS & ADAMS, P.C.

ATTORNEYS AT LAW

2100 M STREET, N.W., SUITE 600

WASHINGTON, D.C. 20037

(202) 429-8910

TELECOPIER (202) 457-8558

RALEIGH OFFICE

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TELEPHONE (919) 781-5800

TELECOPIER (919) 782-8788

file
COPY

RESEARCH TRIANGLE OFFICE

3201 YORKTOWN AVENUE, SUITE 115

DURHAM, NORTH CAROLINA 27713

TELEPHONE (919) 544-2906

October 13, 1987

Mr. Gabriel Kow
Divisional Manager
Glaxo Australia Pty. Ltd.
1061 Mountain Highway Boronia
P.O. Box 158
Boronia Victoria 3155 Australia

Dear Mr. Kow:

I enjoyed the opportunity to meet with you concerning the employment of Maupin, Taylor, Ellis & Adams by Glaxo Australia Pty. Ltd. in connection with repeal or reduction in the so-called "80-20" rule.

Our basic fee will be calculated on an hourly basis. Our time will be charged to you at the rate of \$60 to \$250 per hour depending upon which attorney's services are used. My time will be billed at the rate of \$175 per hour. Paralegal time will be charged to you at \$50.00 per hour. Our hourly rates are subject to periodic revision.

If developments occur during our representation that render the hourly rate charge inadequate, an adjustment in our fee may be made based upon our success in achieving a favorable result, the novelty and difficulty of the issues involved, or time limitations imposed by the client or by circumstances.

We will keep records of time spent and expenses advanced on your behalf. We will submit a statement for payment monthly that will describe the services rendered and expenses advanced. If our representation involves litigation, we will also bill you for court costs, process fees, costs of depositions and discovery, and the like. In the event our statements are not paid within thirty days, we reserve the right to withdraw as your attorney.

Please send us a retainer of \$3,000 against which we will charge our time and expenses. We are pleased to represent Glaxo Australia Pty. Ltd., and will exert our best efforts to protect your interests. We look forward to working with you.

Sincerely,

Scott A. Wilson

Response to Question 4

Describe fully the nature and method of performance of the above indicated agreement or understanding.

Glaxo

Glaxo Australia Pty. Ltd.
Incorporated in Victoria
1061 Mountain Highway Boronia
P.O. Box 168 Boronia Victoria 3155 Australia

Telephone (03) 729 5100 Telex 30287
Fax (03) 729 5319
Cables/Telegrams: Glaxo Melbourne

COPY

30th October 1987

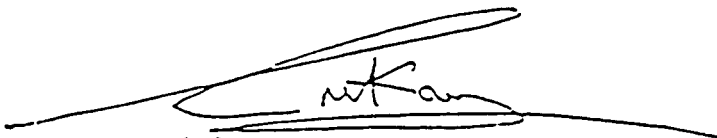
Mr. Scott Wilson
Maupin Taylor Ellis & Adams P.C.
Attorneys at Law
2100 M Street, N.W. Suite 600
WASHINGTON, D.C. 20037

Dear Scott,

Further to your letter regarding our consultancy arrangement, enclosed please find a cheque for US\$3000.

I trust that the relationship between our two organisations will be one of mutual benefit.

Kind regards


Gabriel Kow
General Manager
Chemical Division

Enc.

RECEIVED
OCT 31 1987
FBI - NEW YORK

Exhibit B to Registration Statement
Attachment "F"

Question 4

Describe fully the nature and method of performance of the above indicated agreement or understanding.

MAUPIN TAYLOR ELLIS & ADAMS, P.C.

ATTORNEYS AT LAW

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DURHAM/RESEARCH TRIANGLE OFFICE
100 EAST PARRISH STREET, SUITE 100
DURHAM, NORTH CAROLINA 27701-3393
TELEFAX (919) 688-2352
TELEPHONE (919) 688-2351

MAILING ADDRESS
POST OFFICE BOX 25197
DURHAM, NORTH CAROLINA 27702-2597

April 7, 1989

Mr. Gabriel Kow
General Manager-Chemicals Division
Glaxo Australia Pty. Ltd.
Box 168 Boronia
Victoria 3155 AUSTRALIA

Dear Gabriel:

As you know, we are in the process of registering with the United States Department of Justice as a foreign agent representing Glaxo Australia Pty. Ltd. At the time we agreed to represent Glaxo Australia Pty. Ltd. we did not believe the statute covered our anticipated activities, or at least that we would be exempt under a section that exempts persons "qualified to practice law...." In any event, we have now retained outside counsel to advise on compliance with the statute, and we are registering.

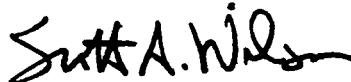
In reviewing our firm's fee agreement with Glaxo Australia Pty. Ltd. (October 13, 1987; copy attached) we propose a modification we believe may be required by the statute, to wit deletion of the third paragraph, which reads as follows:

If developments occur during our representation that render the hourly rate charge inadequate, an adjustment in our fee may be made based upon our success in achieving a favorable result, the novelty and difficulty of the issues involved, or time limitations imposed by the client or by circumstances.

This paragraph has not served as the basis for any of our billings to date, and based on this letter would not serve as the basis for future billings.

I would appreciate your acknowledging your acceptance of this modification to our agreement.

Sincerely yours,



Scott A. Wilson

Enclosure

Exhibit B to Registration Statement
Attachment "G"

Further response to Question 6

Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?

If yes, describe all such political activities indicating, among other things, the relations, interest or policies to be influenced together with the means to be employed to achieve this purpose.

10/7/87 brief Dr. Cliff Kiracofe (Senate Foreign Relations committee) on effect of pending amendment to Foreign Aid Reauthorization bill on implementation of 80/20 Rule.

10/14/87 provide information to Mr. Kiracofe in response to questions regarding the 80/20 Rule.

10/23/87 write Senator Helms regarding 80/20 Rule and deliver letter to Dr. Kiracofe.

11/04/87 contact Dr. Kiracofe; Mr. Dick McCall (Senator John Kerry), Mr. Gerald Connolly (Senate Foreign Relations Committee) regarding the 80/20 Rule.

11/5/87, 11/6/87, and 11/12/89 Coordinate and attend meetings with Mr. Julian Green (Chairman, Tasmanian Poppy Advisory and Control Board) to discuss the 80/20 Rule with the following:

Dr. Kiracofe;
Ms. Marian Chambers, House Foreign Affairs Committee
Mr. Bob Jenkins, "
Mr. Arch Roberts, "
Senator Helms.

12/15/87 Coordinate and attend meeting with Mr. Gabriel Kow (Managing Director, Chemicals Division, Glaxo Australia) and Ms. Chambers to discuss 80/20 Rule.

12/18/87 discuss with Dr. Kiracofe status of Foreign Aid Reauthorization Bill and its potential effect on 80/20 Rule.

1/12/88 discuss with Rayburn Hesse (Bureau of Narcotics Matters, U.S. Department of State) meeting of U.N. International Narcotics Control Board.

1/13/88 solicit views of various government officials regarding effect of Australian support for proposed Turkish consensus resolution at INCB meeting.

1/19/88 discuss with Dr. Kiracofe potential factfinding visit to Australia.

1/20/88 solicit views of Ms. Diane Graham (Bureau of Narcotic Matters, Department of State) towards 80/20 Rule.

1/26/88 discuss with Ms. Chambers potential factfinding visit to Australia.

2/9/88 deliver letters of invitation for congressional factfinding visit to Australia to Ms. Chambers, Dr. Kiracofe, Mr. Jenkins, Mr. McCall, and Mr. Jillel Weinberg (Rep. Ben Gilman).

2/11/89 brief Mr. Connolly and Mr. McCall regarding 80/20 Rule; discuss congressional factfinding visit with Dr. Kiracofe and Dr. James Lucier (Senate Foreign Relations Committee) and Ms. Chambers.

2/16/88 further discussions with Congressional staff regarding delegation visit to Australia.

3/16/88 solicit views towards 80/20 Rule of Ms. Graham, Mr. Jim Lawrence (Drug Enforcement Administration), and Mr. Gene Haislip (Drug Enforcement Administration).

3/31/88 brief Jim Frierson (Office of United States Trade Representative) regarding trade aspects of 80/20 Rule.

4/5/88 brief Ms. Chambers further relative to 80/20 Rule.

4/20/88 brief Mr. Jim Wholey, Mr. Morgan Hardiman, and Ms. Helen Albert (Senator D'Amato) regarding 80/20 Rule.

4/26/88 and 4/28/88 and 5/3/88 arrange and brief Mr. Peter Collins (USTR) and Mr. Ralph Johnson (Department of State) regarding the 80/20 Rule.

5/25/88 solicit Ms. Chambers' views on 80/20 Rule.

6/13/88 solicit Ms. Chambers' views on possible House Foreign Affairs Committee action on drug title to Omnibus Antidrug Abuse Act of 1988.

6/21/88 arrange and attend dinner hosted by Mr. Kow and Mr. Green to discuss 80/20 Rule with Ms. Chambers, Mr. Jenkins, and Dr. Kiracofe.

7/1/88 solicit views of Mr. McCall and Dr. Kiracofe regarding effect on 80/20 Rule of proposed amendments to Omnibus Antidrug Abuse Act of 1988.

7/29/88 solicit views of Dr. Kiracofe and Mr. Tom Boney regarding effect on 80/20 Rule of proposed amendments to Omnibus Antidrug Abuse Act of 1988.

8/3/88 - 8/8/88 monitor developments regarding amendments to Omnibus Antidrug Abuse Amendments of 1988 through conversations with Ms. Chambers, Mr. Boney, and Mr. McCall.

8/29/88 solicit views of Mr. Wholey and Mr. Mike Hathaway (Senate Drug Caucus) towards Omnibus Antidrug Abuse Amendments of 1988.

8/30/88 discussions with Ms. Chambers, Mr. Hardiman, Mr. Wholey, Mr. Hathaway, and Ms. Albert regarding Omnibus Antidrug Abuse Amendments of 1988.

9/9/88 brief Mr. Malinowski and Mr. Paul Stockton (Senator Moynihan's staff) regarding 80/20 Rule.

9/23/88 obtain update from Ms. Chambers regarding amendment to Antidrug Abuse Amendments of 1988 mandating review of U.S. narcotic import policy.

10/28/88 review with Ms. Chambers outcome of Antidrug Abuse Amendments of 1988.

11/4/88 review with Mr. Boney outcome of Antidrug Abuse Amendments of 1988.

11/29/88 brief Mr. Gene Haislip and Mr. Mark Golubock (Drug Enforcement Administration) regarding effect of 80/20 Rule on Australian narcotic alkaloid industry.

1/30/89 arrange meetings for Mr. Green with Ms. Chambers and Mr. Boney.

2/3/89 attend meetings with Mr. Green and Ms. Caroline Millar (Embassy of Australia) with Mr. Jenkins, Ms. Chambers, Mr. Boney, Ms. Albert, and Mr. David McKean (Senator Kerry's staff).

In addition, during the period from November, 1988 through February, 1989 Scott Wilson had numerous discussions with various people about a proposed Congressional delegation factfinding visit to Australia. These people included Senator Helms, Ms. Frances Marcus (Senator Helms's staff), Mr. Don Hardy (Senator Simpson's staff), Mr. Boney, Ms. Chambers, Mr. Jenkins, Mr. Hardiman, and Ms. Albert.